



Dov R. Kleiner
E-Mail: dkleiner@kkwc.com
Direct Dial: 212.880.9874

August 2, 2022

Via Email:

Joshua A. Sussberg, P.C.
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: jsussberg@kirkland.com

Patrick J. Nash, Jr., P.C.
Ross M. Kwasteniet, P.C.
300 North LaSalle Street
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: patrick.nash@kirkland.com
ross.kwasteniet@kirkland.com

Re: In re: CELSIUS NETWORK LLC, et al., Debtors, Chapter 11 Case No. 22-10964 (MG) (jointly administered) (collectively, the “Debtors”) in the U.S. Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”); Reclamation and Demand by Brendan White

Dear Counsel:

This firm represents Brendan White (“White”) a buyer and seller of cryptocurrencies.

White hereby asserts his written demand of reclamation (the “Reclamation Demand”) pursuant to Section 2-702 of the Uniform Commercial Code and Section 546(c) of the Bankruptcy Code for all Tether USD (USDT) (the “Goods”) delivered by White and received by the Debtors, specifically the Goods identified in Exhibit A attached hereto, during the applicable periods referred to in the above-cited sections. The Goods include, without limitation, those Goods that were provided to Debtors pursuant to and itemized in the records Attached in Exhibit A.

Joshua A. Sussberg, P.C.
Patrick J. Nash, Jr., P.C.
Ross M. Kwasteniet, P.C.
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As the Exhibit details, the Goods subject to this Reclamation Demand are valued at \$249,150.54 as of the petition date and summarized as follows:

Date Delivered to Debtors	Amount of Tether USD (USDT)
May 30, 2022	5
May 30, 2022	25,260.96
May 31, 2022	12,607.44
June 2, 2022	217,777.75
June 7, 2022	(15,000) returned
June 7, 2022	8,499.39
Total	<u>249,150.54</u>

By this letter, the Debtors are instructed to immediately inventory the Goods, keep the Goods segregated from all other property of the Debtors, and provide White a written account and summary disclosing the status of all Goods, to the extent such relief is consistent with the Bankruptcy Code and any order entered by the Bankruptcy Court.

White reserves the right to further amend or supplement this Reclamation Demand, including providing additional evidence in support or submitting additional notices of claims.

White reserves all other claims at law or in equity, including but not limited to its rights to an allowed administrative claim pursuant to section 503(b)(9) of the Bankruptcy Code for all Goods received by the Debtors within twenty days before the commencement of the Debtors' bankruptcy cases, its rights under sections 503(b)(1)(A), 362(b)(3), 546(b)(1)(B), and 546(c) of the Bankruptcy Code, Section 2-702 of the Uniform Commercial Code, its contracts, applicable law, and any order of the Bankruptcy Court.

Please contact me if you have any questions or comments regarding the foregoing.

Sincerely,



Dov Kleiner

Enclosures



Exhibit A - Records

The screenshot shows the Celsius app interface. At the top, there's a navigation bar with a Celsius logo and a user profile icon. Below this is a header section with a warning message about withdrawals. The main content area is divided into two sections: 'Transactions' and 'User Profile'.

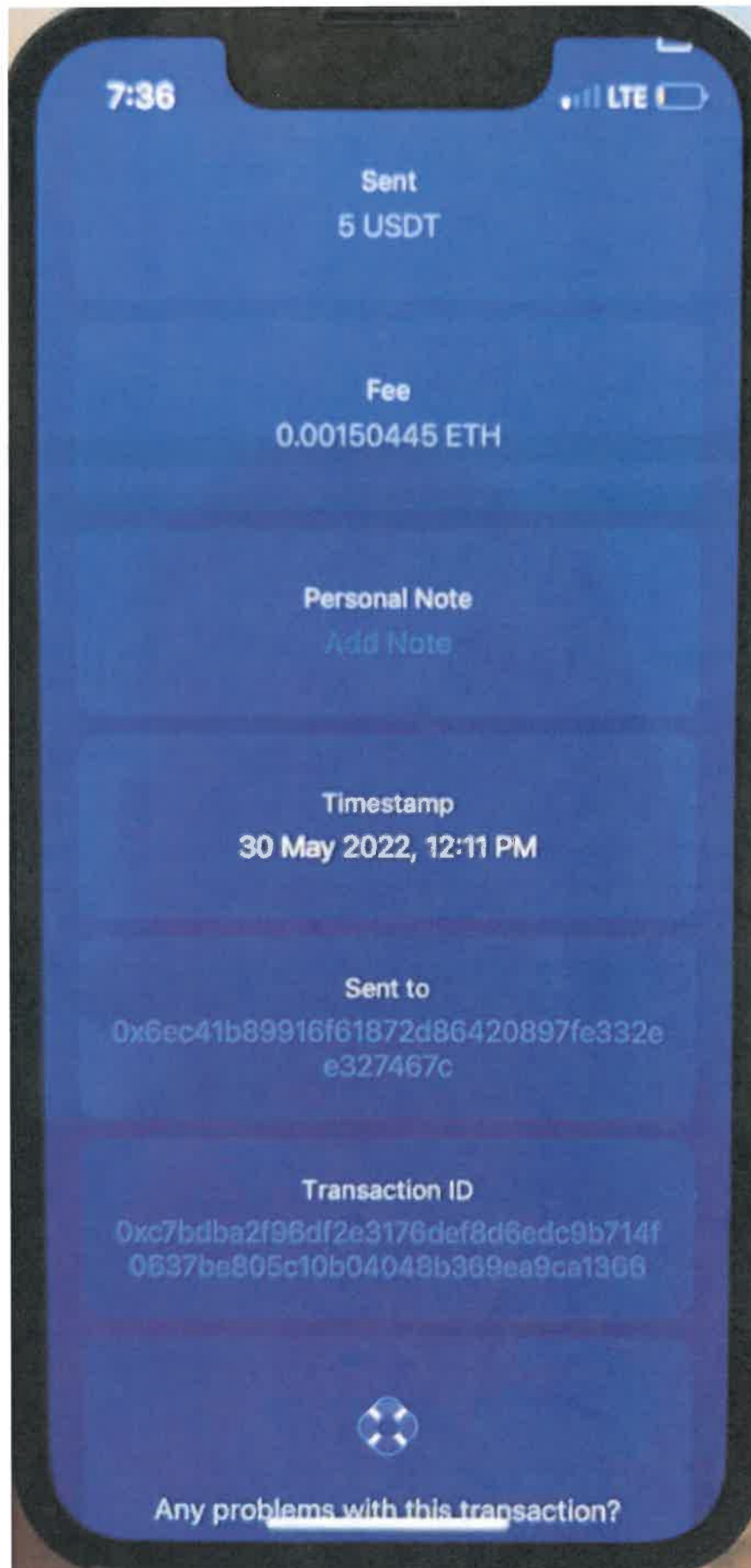
Transactions Section:

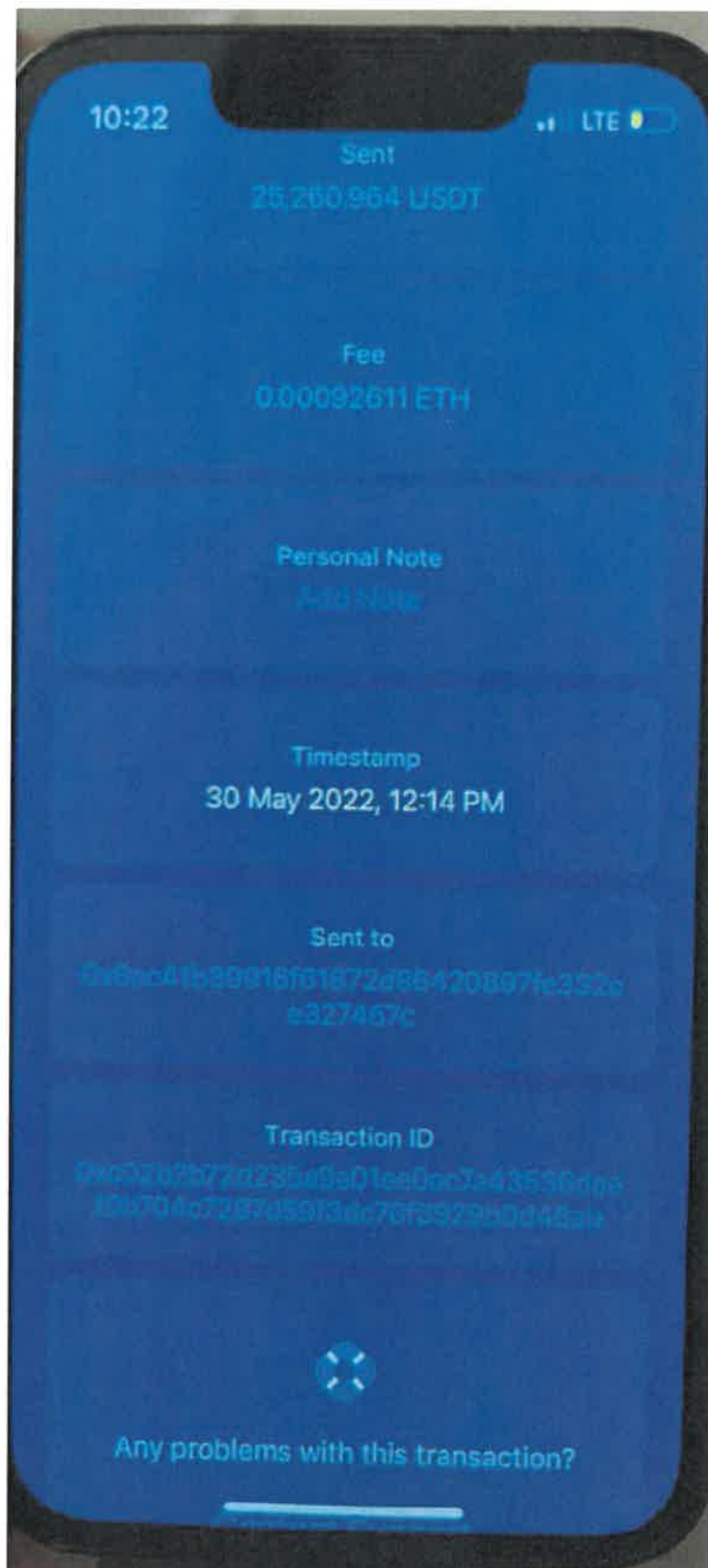
Transaction	Status	Date & Time	Amount	Balance
Receive	Completed	Jun 7, 2022 10:46 PM	47% Bitcoin (BTC)	+10,400.80
Receive	Completed	Jun 2, 2022 12:22 PM	177,777,777 USDT (USDC)	+117,777.76
Receive	Completed	May 30, 2022 10:10 PM	31,807,443,000 USDT (USDC)	+12,807.44
Receive	Completed	May 30, 2022 12:18 PM	25,160,043,000 USDT (USDC)	+12,800.00
Receive	Completed	May 30, 2022 12:12 PM	5 USDT (USDC)	+1.00
Receive	Completed	May 25, 2022 10:44 PM	27,700 USDT (USDC)	+123,700.00

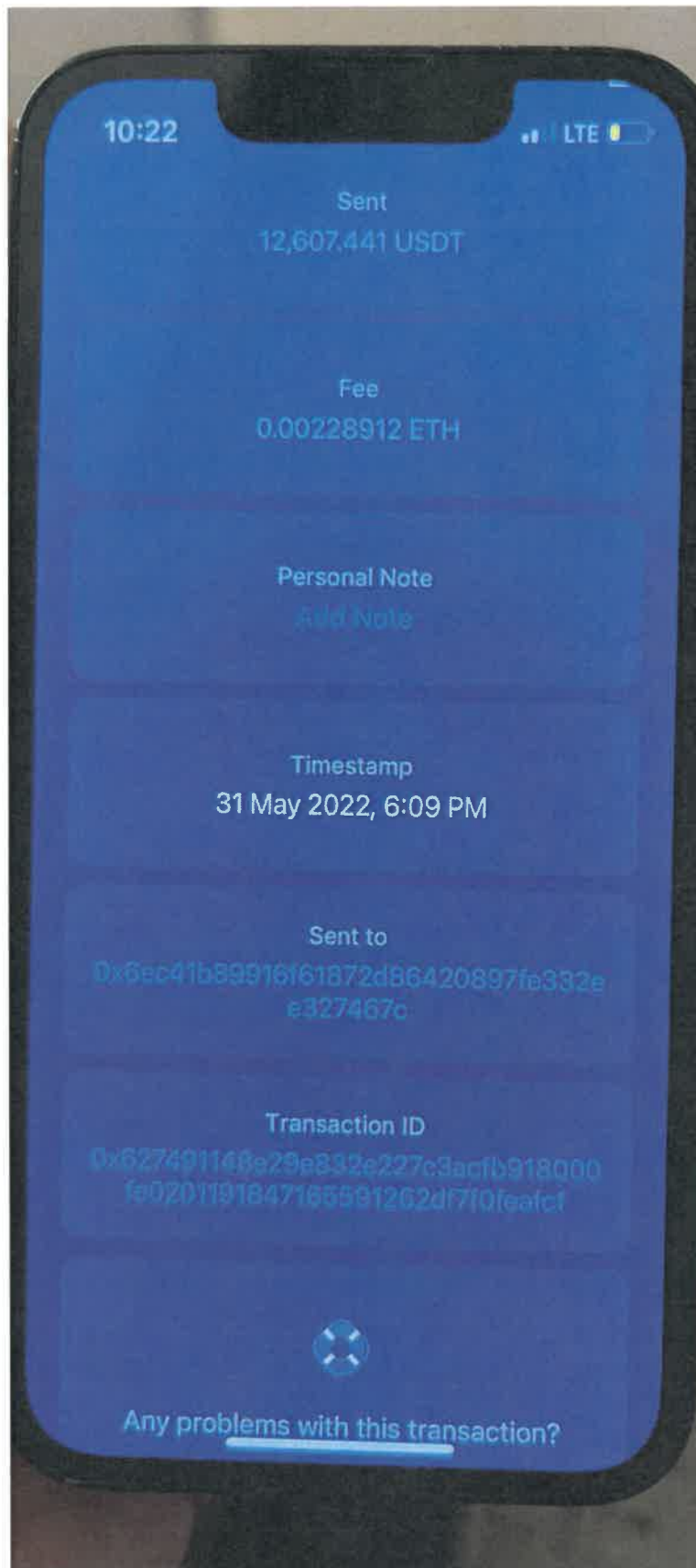
User Profile Section:

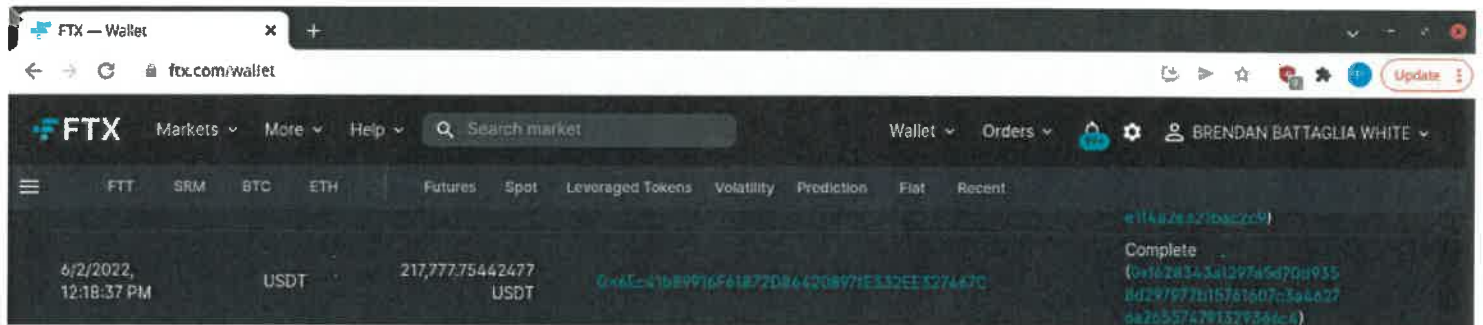
Brendan Battaglia White
 Investment Advisor
 Monday, June 13, 2022
 01602206127

Below the profile, there are several tabs: 'Data', 'History', 'Settings', 'Security', 'Support', and 'Logout'. The 'Data' tab is currently selected, showing a list of data points with icons and labels.









6:03



Personal Note

[Add Note](#)

Created

A few seconds ago...

Sent to

0x6ec41b89916f61872d86420897fe332e
e327467c

Transaction ID

0x0a1ca9a97c5fbe2490c5bf70b0580ebb
72bb78aff5ee2e0e93cfd6c9cd953b8b

Now

\$8,500.00



Any problems with this transaction?

[Contact Support](#)